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6 Attorneys for CARENET PREGNANCY CENTER
OF PARADISE INCORPORATED
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8
9 **UNITED STATES BANKRUPTCY COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**
11 **SAN FRANCISCO DIVISION**

12 *In re:*

13 PG&E CORPORATION

14 -and-

15 PACIFIC GAS AND ELECTRIC
16 COMPANY

Debtors.

17 ☐ Affects PG&E Corporation

18 ☐ Affects Pacific Gas & Electric

19 ☒ Affects Both Debtors

20 *All papers shall be filed in the Lead Case,*
21 *No. 19-30088 (DM)*

)
) **Case No. 19-30088 (DM)**
) Chapter 11
) (Lead Case)
) (Jointly Administered)
)
) **DECLARATION OF LINDA**
) **KALANQUIN IN SUPPORT OF MOTION**
) **PURSUANT TO FEDERAL RULE OF**
) **BANKRUPTCY PROCEDURE 9006(b)(1)**
) **TO DEEM CARENET PREGNANCY**
) **CENTER OF PARADISE,**
) **INCORPORATED'S CLAIM TIMELY**
) **FILED**

) Date: August 4, 2020
) Time: 10:00 a.m. (Pacific Time)
) Place: To Be Held Telephonically (or Via
) Video, Where Approved or
) Applicable)
Judge: Honorable Dennis Montali

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24 I, Linda Kalanquin, hereby declare and state as follows:

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26 1. This declaration is based upon my personal knowledge unless otherwise indicated. If
27 called upon to testify as to the matters stated herein, I could and would competently do so.

28 2. I am the Executive Director of the Carenet Pregnancy Center of Paradise,

1 Incorporated, ("The Center") a 501(c)(3) non-profit organization.

2 3. On November 8, 2018, the Center's building at 6189 Clark Road, Paradise, California,
3 was completely destroyed by the Camp Fire.

4 4. The organization's business was disrupted, except for providing sporadic minor
5 assistance to clients.

6 5. Each of my staff at the Center also lost their homes to the Camp Fire.

7 6. Some of the Center's board members lost their homes to the Camp Fire, as well, and
8 had to move out of the area. Only recently, has the Board been able to meet.

9 7. The Camp Fire destroyed my personal home, as well as another home we owned and
10 the homes of my son and my daughter. I was trying to assist in finding housing for our family
11 and then assist in the recovery process of four homes during the months following the Camp Fire.
12 My mother had come to live with us ten days before the fire, and I was continuing to care for her,
13 as well.

14 8. In April of 2019, I was diagnosed with cancer for which I am continuing to be treated.
15 I underwent severe radiation and oral chemotherapy which affected my mental acuity for all of
16 last year.

17 9. I have had intense reactions to the medications. Although I am improving, the
18 medication I am currently taking continues to affect my mental status. Ever since the Camp Fire,
19 my life has been overwhelming. My medical condition has only added to this, and has caused
20 confusion and mental difficulty.

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3 10. For all of the above reasons, I did not file a claim in the PG&E bankruptcy on behalf
4 of the Center until recently.

5 I declare under penalty of perjury under the laws of the State of California and the United
6 States that the foregoing is true and correct.

7 Executed at Paradise, California, on July 3, 2020.
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13 LINDA KALANQUIN
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